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October 13, 2022

Hon. Lewis J. Liman, U.S.D.J.  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

*Via ECF*

Re: **689 Eatery Corp., etc. et ano. v. City of New York, et al.,**  
**Docket No. 02 CV 4431 (LJL) (“Action No. 1”)**

**59 Murray Enterprises, Inc. etc., et ano. v. City of New York, et al.,**  
**Docket No. 02 CV 4432 (LJL) (“Action No. 2”)**

**Club at 60th Street, et al. v. City of New York**  
**Docket No. 02 CV 8333 (LJL) (“Action No. 3”)**

**336 LLC, etc, et al. v. City of New York**  
**Docket No. 18 CV 3732 (LJL) (“Action No. 4”)**

Dear Judge Liman:

We represent the Plaintiffs in the above-referenced Action No. 2 and write on behalf of the Plaintiffs and Defendants in each of the related cases listed above.

By Minute Order entered on the docket of each of the above-referenced Actions on October 6, 2022, Your Honor directed counsel for the parties to “report to the Court a proposed briefing schedule for opposition and reply papers (and possible cross-motion papers) by October 14, 2022.”

Counsel have conferred and jointly propose the following schedule for the remaining briefing at this time, based upon the projected time needed for each item and counsels’ respective schedules:

- Outside date to file a second supplemental stipulation of facts - - November 18, 2022\*
- Due date for opposition papers on pending motions and cross-motion - - January 13, 2023 (56 days from item 1)
- Due date for reply papers on pending motions and opposition to cross-motion - - February 10, 2023 (28 days from item 2)
- Due date for reply papers on cross-motion - - March 15, 2023 (33 days from item 3)

Respectfully,  
*Edward S. Rudofsky*  
Edward S. Rudofsky

Cc: All Counsel (Via ECF)

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\* If a second supplemental stipulation of facts cannot be agreed upon, plaintiffs reserve the right to seek the deposition of the PMK.